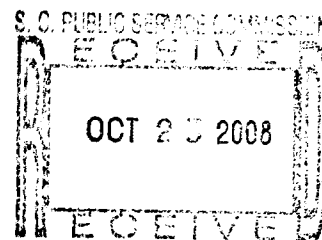


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**LIFELINE AND LINK UP**

**ADVERTISING AND OUTREACH PLAN**

**Of**

**AFFORDABLE PHONE SERVICES, INC. D/B/A HIGH TECH**  
**COMMUNICATIONS**

**For The**

**STATE Of South Carolina**

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## **SUMMARY**

Affordable Phone Services, Inc. d/b/a High Tech Communications has developed this Advertising Plan (the "Plan") in compliance with Chapter 103-690 of the South Carolina Code of Regulations (Unannotated), which requires carriers who are "seeking ETC designation for the purposes of participation in the Lifeline and Link Up programs" to "submit a two-year plan that describes the carrier's plans for advertising and outreach programs for identifying, qualifying, and enrolling eligible participants in the lifeline and Link Up programs". In accordance with state and federal requirements, High Tech will "Publicize the availability of Lifeline service in a manner reasonable designed to reach those likely to qualify for the service"<sup>1</sup>.

Implementation of the Company's Advertising Plan will commence upon designation as an Eligible Telecommunications Carrier ("ETC") and will continue for a term no less than twenty-four (24) months from the date that the approval order becomes effective.

## **BACKGROUND**

Affordable Phone Services, Inc. d/b/a High Tech Communications ("High Tech", the "Company") is a Florida Corporation<sup>2</sup> and is authorized to conduct business as a foreign corporation in the State of South Carolina. High Tech was granted a Certificate of Public Convenience and Necessity to Provide Competitive Resold Local Exchange Telecommunications Services within the State of South Carolina Pursuant to Order No. 2004-497 issued in Docket No. 2004-146-C on October 13, 2004. The Company's principle office is located at 2855 SE 58<sup>th</sup> Avenue, Ocala, Florida 34471.

High Tech provides local exchange and exchange access service in the AT&T Southeast (f/k/a Bellsouth) exchanges of South Carolina using a combination of resale and unbundled network elements (UNEs) or unbundled network element equivalents obtained through agreements with the underlying carrier. These agreements allow the Company to provide end-to-end switching and delivery of calls.

## **ADVERTISING AND OUTREACH PLAN**

The Advertising and Outreach Plan of the Company is structured to promote maximum visibility of the Lifeline and Link Up programs throughout the State of South Carolina. High Tech will use advertising mediums that have a proven track record of effectively identifying, informing, and educating current and potential subscribers of the Lifeline and Link Up programs thereby increasing consumer awareness and the overall penetration of Lifeline and Link Up subscribership in South Carolina. The Company will begin implementation of its Advertising and Outreach Plan throughout the AT&T Southeast exchanges in the State of South Carolina upon designation as an ETC, which will continue for a period of no less than 24 months.

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<sup>1</sup> CFR 47 § 54.405(b)

<sup>2</sup> High Tech was incorporated in the State of Florida on May 1, 1993

## **I. Advertising and Outreach to Existing Customer Base**

Upon designation as an Eligible Telecommunications Carrier (“ETC”) in the State of South Carolina, High Tech will implement its Advertising Plan by contacting the Company’s existing customer base.

This goal of this phase of the Advertising Plan will be two-fold. The first goal is to inform existing customers not only of the availability of Lifeline and Link Up, but also of the savings that eligible consumers can anticipate.

The second goal is to educate customers as to the eligibility requirements for participation in the Lifeline and Link Up programs.

To accomplish these goals, High Tech will utilize USACs Consumer Outreach Lifeline and Link Up letter, a copy of this which is included with this Plan and is labeled as Attachment 1. A copy of this notification will be included by the Company as a billing insert. Approximately 30 days after the billing insert has been sent, High Tech will send a stand-alone notice of the same, via U.S. mail, to each active non-responding customer.

Approximately 60 days after the billing insert has been sent, the Company’s customer service representatives will begin contacting customers who have not responded to either mailing in an effort to make the existence of and the eligibility requirements for this vital low-income program known.

High Tech anticipates that the expected implementation period for this phase of the Company’s Advertising Plan to will take approximately three (3) months.

## **II. Advertising and Outreach to New Customers**

### **A. Governmental Agencies**

High Tech will coordinate its outreach efforts with and provide advertising materials to governmental agencies and other organizations that administer relevant governmental assistance programs and cater to those likely to qualify for support. Currently, the Company’s advertising plans call for it to coordinate advertising and outreach efforts with organizations such as:

Social Service Agencies  
Community Centers  
Local Counsel on Aging Centers  
United Way  
AARP

Implementation of this phase will begin upon completion of the Company's Outreach to its existing customer base and will be ongoing in nature. High Tech expects that it will take approximately twelve (12) months to make outreach materials fully available throughout the designated service area.

#### **B. Print Media**

High Tech will begin print advertising using a media of general distribution. Specifically, the Company will begin by advertising the availability of Lifeline and Link Up in the designated area through free publications such as the Dollar Saver and Thrifty Nickel. These publications, and others like it, are available without cost or subscription requirements and are widely distributed throughout the State of South Carolina. As such, High Tech believes that this form of advertisement to not only be effective but is consistent with the requirements of §54.405 and 54.411, which require ETCs to publicize the availability of Lifeline and Link Up service in a manner reasonable designed to reach those likely to qualify for the support.

Implementation will begin upon completion of the Company's Governmental Outreach campaign and will take approximately six (6) months to fully implement in all of the designated service area. Once in place, High Tech will continue its print media advertisement on an ongoing basis.

#### **C. Broadcast Media**

High Tech will implement a brisk and consistent broadcast advertising campaign throughout South Carolina. Implementation of this phase of the Company's advertising and outreach campaign will commence with advertising on broadcast TV stations in lieu of cable TV due to the lack of low-income viewership.

Current broadcast plans call for the Company to begin advertising on broadcast TV stations throughout the State of South Carolina. In addition, the Company will specifically target stations with affiliate TV and Radio stations.

Implementation will begin upon completion of the Company's Print Media Campaign. High Tech anticipates that it will take approximately six (6) months to fully implement its Broadcast Outreach in all of the designated service area. Like the Company's print media campaign, High Tech anticipates that its broadcast advertising campaign will continue unabated.

### **III. Qualification and Enrollment**

Lifeline is a program that provides eligible consumers with a monthly recurring discount, off of the rate for basic local exchange service, of up to \$13.50.

Link Up provides eligible consumers with a 50%, up to \$30.00, off of the cost associated with connecting local exchange service.

Consumers are eligible for Lifeline and Link Up support if they participate in one of the following State approved needs-based programs:

- Food Stamps
- Medicaid
- Family Independence (TANF)

High Tech has developed a compliance manual, which provides detailed information of the specific requirements for eligibility in Lifeline and Link Up on a state-by-state basis.

All advertising and outreach materials will direct consumers to call High Tech at toll free 877-369-0999. The Company's customer service representatives will assist consumers to determine if they are eligible for Lifeline and Link up benefits. When a customer is deemed eligible, representatives will send, by fax, email, or U.S. mail, a copy of the Company's self-certification form. This form allows customers to self-certify, under penalty of perjury, that they meet the need-based eligibility requirements of the State. In addition, High Tech requires all customers to provide documentation of proof of eligibility, which can be in the form of a copy of the customers Medicaid card, Food Stamp card, or certification from the appropriate State Department. Eligible customer accounts will be enrolled in Lifeline and applicable Lifeline and Link Up credits will be provided after proof of eligibility has been received by the Company.

#### **IV. Verification of Continued Eligibility**

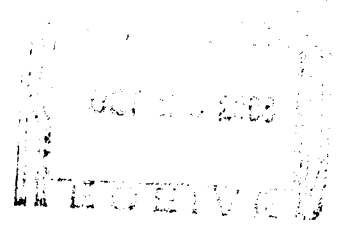
The FCC has recommended that all states, including federal default states, be required to establish procedures to verify a consumers' continued eligibility in the Lifeline program under Program Based or Income Based Eligibility criteria, which could include, but would not necessarily be limited to, random beneficiary audits, periodic submission of documents, or annual self-certification. However, to date, no clear-cut method of verification has been established. For example, in some states, the ETC is responsible for verifying the consumer's continued eligibility, while other states require their state agencies to devise procedures for eligibility verification. Still another state establishes eligibility verification procedures that involve state agency and carrier participation.

As such, High Tech has elected to follow the FCC's recommendation that ETCs be required to verify annually the continued eligibility of a statistically valid sample of their Lifeline subscribers. Under this program, ETCs are free to verify directly with a state that particular subscribers continue to be eligible by virtue of participation in a qualifying program or income level. Alternatively, to the extent ETCs cannot obtain the necessary information from the state, they may survey the subscriber directly and provide the results of the sample to USAC.

Subscribers who are subject to this form of verification and who qualify under Program Based Eligibility criteria must prove their continued eligibility by presenting in person or sending a copy of their Medicaid card or other Lifeline-qualifying public assistance card and self-certifying, under penalty of perjury, that they continue to participate in the Lifeline-qualifying public assistance program.

Subscribers who are subject to this form of verification and who qualify under the Income Based Eligibility criteria must prove their continued eligibility by presenting current documentation consistent with the federal default certification process. These subscribers must also self-certify, under penalty of perjury, the number of individuals in their household and that the documentation presented accurately represents their annual household income.

**Exhibit 1**  
**Wire Centers**



Company	Switch
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLVRSCESRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BMBRSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SPFDSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JHTNSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BAVLSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EOVRSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSA773
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	AIKNSCMAXMD
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PRSRSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NWBYSMA27E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CMDNSCLGRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORBGSCMA53E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BRWLSCBERS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ALDLSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BATHSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BTBGSCMA53E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EDFDSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	AIKNSCMA64E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NWELSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GIVLSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YORKSCMA68F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WHTMSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CMDNSCMA43F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCPARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCDF78E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSH77E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCAR75E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSU78E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DNMKSCESRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WCLMSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LKWLSRCSR1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCH78E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BHISSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSA77E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HCGVSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SHRNSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCBQRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSW79E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHAPSCCLRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NAGSSCMA27E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSRS2
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GSTANCSO85G
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSN25E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLMASCSN79F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	RWLDNCMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GBSNNCMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TMVLSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MARNSCBNRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SCHLSCESRS1

BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DRTNSCMA39F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCBE5MD
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MARNSCMA42E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BEVLSCMA47E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MCCLSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MLNSSCWP46E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BLNHSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCJN55E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CLIOSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FLBHSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STGRSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LATTSCLSRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LKVWSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCWA85E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCJM79E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DLLNSCMA77E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCWA55E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HTVLSCMA33E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCDP82E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SBRKSCSKRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EDBHSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SUVLSCMA87E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ISPLSCISRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHRWSCES53E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCLB55E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MNPLSCES88F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCDT72E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHTNSCNO74F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FLRNSCMA66F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GNVLSCWPRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ARSNSCTVRS1
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LYMNSCIP433
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SPBGSCW50E
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FNVLSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SPBGSCWV57E
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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GNVLSCCH24E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CENTSCWRSR1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNTNSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WMNSSCESRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JNVLSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JONNSCESRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WLHLSCESRS1

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BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LYMNSCES43E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ARSNSCMA22F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TKNASCSTRS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GNVLSCDT23F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BLRGSCMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SENCSCMA88E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GNVLSCWR28F
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GRERSCMA87F